

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BACKERTOP LICENSING LLC, )  
)  
Plaintiff, ) C.A. No. 1:22-cv-00573-CFC  
v. )  
)  
AUGUST HOME, INC., )  
)  
Defendant. )  
)  
BACKERTOP LICENSING LLC, )  
)  
Plaintiff, ) C.A. No. 1:22-cv-0572-CFC  
v. )  
)  
CANARY CONNECT, INC., )  
)  
Defendant. )

Thursday, July 20, 2023  
1:00 p.m.  
Hearing

844 King Street  
Wilmington, Delaware

BEFORE: THE HONORABLE COLM F. CONNOLLY  
United States District Court Judge

1 APPEARANCES:

2 CHONG LAW FIRM PA  
3 BY: JIMMY CHONG, ESQ.

4 -and-

5 FINGER & SLANINA  
6 BY: DAVID FINGER, ESQ.

7 Counsel for the Plaintiff

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P R O C E E D I N G S

(Proceedings commenced in the courtroom beginning at  
1:00 p.m.)

**THE COURT:** Good afternoon. Please be seated.  
Mr. Chong and Mr. Finger.

Go ahead, Mr. Finger. How are you?

**MR. FINGER:** Thank you, Your Honor. I am  
assuming Your Honor has read the objection that was filed.

**THE COURT:** Yes.

**MR. FINGER:** I don't have much to add to that  
other than to answer Your Honor's questions.

The witness, Ms. LaPray, is not here. You have  
received some documents, and I wanted to explain the  
background to that a little bit.

**THE COURT:** Yes.

**MR. FINGER:** I think it was oversimplified in  
Mr. Burn's letter. When deciding how we were approaching  
this, Mr. Burns had documents in his possession, and one  
option was to give them back. But I felt that Your Honor  
would not accept that as superior to a Court order.

So since they were already in his possession,  
since we did not want to get him in trouble with the  
Court, we said, okay, they're already in your possession.

1 Let them go. But beyond that, my clients are not  
2 participating.

3 **THE COURT:** When you say, "clients," plural,  
4 who are your clients?

5 **MR. FINGER:** I'm sorry. Well, I represent  
6 Creekview in tomorrow's hearing and Backertop Licensing  
7 here today.

8 **THE COURT:** So you've instructed Mr. Burns now  
9 that it was okay for him to turn over all the documents in  
10 his possession, custody, and control that were responsive  
11 to the original document request?

12 **MR. FINGER:** Yes, Your Honor. I saw a letter  
13 from him docketed yesterday explaining that he is doing  
14 that and that he is delivering in some fashion -- I don't  
15 know if he's already done it -- a USB drive with the  
16 documents on them.

17 **THE COURT:** All right. And then just so I'm  
18 clear, what is it, if anything, about his description of  
19 the situation that you take issue with?

20 **MR. FINGER:** Well, as far as, it's just he  
21 said -- or they changed their mind without any explanation  
22 of the reasoning, so I've added to that.

23 **THE COURT:** Oh, you're just adding to it.

24 **MR. FINGER:** Yes.

25 **THE COURT:** Oh, I see. All right.

1           **MR. FINGER:** I felt it was a little more -- it  
2 was not sufficiently illustrative of the reasoning.

3           **THE COURT:** Okay. All right. So he has  
4 produced documents.

5           **MR. FINGER:** Yes.

6           **THE COURT:** All right. And then Mr. Chong,  
7 just within the last hour, I think, produced documents.  
8 Correct, Mr. Chong?

9           **MR. CHONG:** I had ordered to have them hand  
10 delivered yesterday afternoon. I'm not sure when they  
11 came in.

12           **THE COURT:** Okay. We just got them. All  
13 right. And is this the same -- well --

14           **MR. FINGER:** I don't know if it is duplicative,  
15 Your Honor.

16           **THE COURT:** Well, okay, but you've given  
17 Mr. Chong permission to turn over those documents.

18           **MR. FINGER:** I did not want to have Mr. Chong,  
19 who is a member of this bar, particularly, to get in  
20 trouble with Your Honor.

21           **THE COURT:** All right. And then Ms. LaPray is  
22 not -- did not show today.

23           **MR. FINGER:** Correct, Your Honor.

24           **THE COURT:** All right. So it seems to me what  
25 I ought to do is set a hearing for good cause as to why

1 she should not be held in contempt.

2 So I think why don't we do that for August 10th  
3 at 1:00. Will that work?

4 **MR. FINGER:** If I may, Your Honor, I'm on  
5 vacation from the 4th through the 12th, so if Your Honor  
6 can make it a little bit later. And I can't get to my  
7 calendar because it's in a pouch.

8 **THE COURT:** You're welcome to go --

9 **MR. FINGER:** It's in a pouch, so I can't even  
10 open it. I didn't have my bar card, so I apologize.

11 **THE COURT:** Okay.

12 **MR. FINGER:** I haven't been in this Court in so  
13 long I didn't realize that's how it worked.

14 **THE COURT:** Well, I want to make sure you're  
15 afforded and Ms. LaPray is afforded process.

16 It may be, if I set a good cause hearing, are  
17 you just going to file something that says, we're not  
18 showing up again? Do you know?

19 **MR. FINGER:** Well, I suppose, Your Honor, to --  
20 I haven't given it a lot of thought, but I think my  
21 reaction would be, basically, to respond, arguing that the  
22 order from which Your Honor is seeking a contempt ruling  
23 is invalid.

24 It's the same arguments that we've made in the  
25 objection, only now, I guess, organized in the context of

1 a response.

2 **THE COURT:** Okay.

3 What's the dates you said you are away?

4 **MR. FINGER:** The 4th through the 12th. And  
5 just so Your Honor knows, I think it's around the 20th, I  
6 have a trial in Chancery. It's a half-day trial,  
7 hopefully.

8 **THE COURT:** On the, what day do you think it  
9 is?

10 **MR. FINGER:** Either the 20th or the 21st.

11 **THE COURT:** The 21st is a Monday, so I'll bet  
12 you it's the Monday.

13 **MR. FINGER:** Let me put it this way, Your  
14 Honor, I'm happy to -- we can set a date, but if Your  
15 Honor is open to it, if there is any conflict, I will  
16 inform the Court.

17 **THE COURT:** That would work.

18 Well, here's what else we could do. Why don't  
19 we set it for August 1st before you go away?

20 **MR. FINGER:** What day of the week is that?

21 **THE COURT:** It's a Tuesday.

22 **MR. FINGER:** Tuesday.

23 **THE COURT:** Will that give you enough time?

24 **MR. FINGER:** I think that's doable. I'm only  
25 asking because I'm getting married.

1                   **THE COURT:** Oh, wow. Congratulations.

2                   **MR. FINGER:** Thank you. And this is going to  
3 be -- it's not going to be the first, we're getting a  
4 marriage license that week. Oh, I'm sorry, we're getting  
5 it in late July, so that should work out fine.

6                   **THE COURT:** Okay. Wow.

7                   **MR. FINGER:** I get that reaction a lot, Your  
8 Honor.

9                   **THE COURT:** Congratulations.

10                  **MR. FINGER:** Thank you.

11                  **THE COURT:** Well, why don't we set, how about  
12 for August 1st at 10:00 a.m.?

13                  **MR. FINGER:** All right. And when would Your  
14 Honor like our --

15                  **THE COURT:** Well, actually, I'm not requiring  
16 anything.

17                         The way I look at it is this, I want to make  
18 sure we comport with due process, and if your position  
19 isn't going to change and there's no justification that  
20 you haven't already brought to my attention --

21                  **MR. FINGER:** You could accept it?

22                  **THE COURT:** -- I would imagine I'm going to  
23 hold her in civil contempt and impose coercive measures to  
24 try to get her to comply with a Court order. Clearly, the  
25 Court is empowered to do that.



1           **MR. FINGER:** So would it be all right, Your  
2 Honor, if we just say that the objection we filed will  
3 count as our submission in connection with a contempt? Or  
4 do you want it --

5           **THE COURT:** You do whatever you want to do.

6           **MR. FINGER:** Okay.

7           **THE COURT:** You are going to be given, and  
8 Ms. LaPray is going to be given an opportunity to be  
9 afforded -- I'm going to strike that.

10           She is going to be given an opportunity to show  
11 good cause why she shouldn't be held in contempt for  
12 disobeying a Court order.

13           Now, it does strike me, though, in light of the  
14 productions from counsel and some of the issues that were  
15 raised at the hearing in June, that it appears that  
16 Backertop, your client, has not complied with the document  
17 production order.

18           Do you contest that?

19           **MR. FINGER:** I can't say or not. I have not  
20 seen the documents.

21           **THE COURT:** For instance, as I discussed with  
22 Mr. Chong and Mr. Burns last time, there's attachments  
23 missing from e-mails. There are documents referenced in  
24 e-mails that weren't included.

25           The other thing is we have the benefit of

1 productions from other related Mavexar cases, and it's  
2 clear from the production in those cases that we must  
3 be -- that we don't have all the documents.

4 And then there's just common sense. There's --  
5 unless there's just really no normal business-type  
6 dealings here, it's just very apparent that there's no  
7 written communications about matters you'd expect to see  
8 written communications.

9 Is it possible everything was conducted by  
10 phone? I suppose so.

11 **MR. FINGER:** Especially in a small company.

12 **THE COURT:** Could be. But anyway, the point  
13 is, we also had text messages produced in at least one  
14 other related case, and, again, if the parties were acting  
15 consistently with all Mavexar-related LLCs, you would  
16 expect to have seen text messages.

17 But I'm not making any definitive ruling. What  
18 I'm saying is that that's hanging out there, and if you,  
19 for instance, knew that, in fact, yes, Backertop had not  
20 produced all the documents consistent with the order, it  
21 would be helpful to get that on the record and wrap  
22 everything up all at once.

23 **MR. FINGER:** Your Honor, I believe in candor to  
24 the Court, so I will investigate and advise Your Honor.

25 **THE COURT:** And I also think it's not just

1 candor; it's just efficiency.

2 In other words, I don't know what Backertop's  
3 end game is or Mavexar's end game or Ms. LaPray's end game  
4 is. But it just seems, even those folks would be served  
5 by trying to do things efficiently.

6 **MR. FINGER:** Your Honor, I don't mean to throw  
7 my friend under the bus, but since he did produce some  
8 documents, he may be in a better position to answer those  
9 questions if Your Honor wants to inquire.

10 **THE COURT:** And I will ask Mr. Chong a couple  
11 questions about that; although, my guess is that Mr. Chong  
12 has been left largely in the dark about a lot of these  
13 things.

14 **MR. FINGER:** Very well, Your Honor. Thank you.

15 **THE COURT:** Mr. Chong, can I just ask you on  
16 that, question you about some of the documents?

17 **MR. CHONG:** Yes.

18 **THE COURT:** So in terms of Backertop's  
19 compliance with the document request, can you just tell me  
20 what efforts you made to confirm that Backertop had, and,  
21 you know, was there anything more than you speaking  
22 directly with somebody from Mavexar or with Ms. LaPray?

23 **MR. CHONG:** I mean, I spoke with Mavexar, with  
24 Ms. LaPray, and with Attorney Burns, and received  
25 verbal -- they verbally told me that they have searched

1 everything and have produced everything that they could  
2 find in compliance with your order, Your Honor.

3 **THE COURT:** So, for instance, there is, in the  
4 document production that we just got from you within the  
5 last hour.

6 I realize you may have filed it yesterday or  
7 instructed deliverers yesterday, but we didn't get it  
8 until a few minutes ago.

9 But just quickly looking at it, there's at  
10 least two instances I saw that have a link to a lockbox of  
11 documents that apparently were provided to Ms. LaPray by  
12 Mavexar-type people. I didn't see the contents of the  
13 lockbox in here.

14 **MR. CHONG:** Lockbox?

15 **THE COURT:** Yeah. Did I say lockbox? That's  
16 my, sorry, my age showing. A Dropbox.

17 **MR. CHONG:** Oh, a Dropbox.

18 **THE COURT:** Let me give you another example.  
19 You've got -- and you've designated this confidential.  
20 The very first document is the agreement between your law  
21 firm, right, and Backertop.

22 You've produced these same agreements during  
23 hearings with no assertion of privilege, how is that  
24 privileged here?

25 **MR. CHONG:** They were produced -- when they

1 were previously produced -- and I have to go back and  
2 check the records -- my understanding was that we were  
3 producing everything under privilege, and that's why they  
4 were not filed.

5 **THE COURT:** But you've introduced this at a  
6 hearing in front of me. Right. You actually put up the  
7 letter. And there was no objection. No?

8 **MR. CHONG:** I would have to recall that. I  
9 mean, I would like to go back and look into that.

10 I believe -- I don't -- I don't recall off the  
11 top of my head.

12 **THE COURT:** Okay, then let's tackle this. Then  
13 I've got a copy of an engagement letter. There is no  
14 cover e-mail. There is nothing that you would expect to  
15 see as to how this document got transported between your  
16 law firm and Ms. LaPray, how signatures got on it, right.  
17 In your production, there's nothing attached to that.

18 I mean, do you remember how you ended up  
19 getting in Ms. LaPray's hands an engagement letter, how it  
20 was executed by her, how you got it back? Do you remember  
21 anything about that?

22 **MR. CHONG:** I don't. I mean, I produced  
23 everything -- I went through my search on my e-mail, and  
24 everything that was on my search, I produced. I don't  
25 recall specifically. I don't, Your Honor.

1           **THE COURT:** All right. Well, then, you know,  
2       when I look at -- do you have this production in front of  
3       you by any chance?

4           **MR. CHONG:** Yes, Your Honor.

5           **THE COURT:** So, like, if you turn to Page 26.  
6       There's an e-mail there from you to Mr. Burns. It says,  
7       "attachment image 1, image 2." I don't see them in here.  
8       At least I don't think I do.

9           **MR. CHONG:** I think that's just his -- his firm  
10      logo.

11          **THE COURT:** Okay.

12          **MR. CHONG:** That's the attachment is his firm  
13      logo.

14          **THE COURT:** All right. Then turn to the next  
15      page, Page 28, here's the Dropbox, right? Folks from  
16      IP Edge are informing Mr. Burns that here's the link to  
17      the Dropbox that Backertop has with --

18          **MR. CHONG:** I guess, so this information, I  
19      think -- I believe this is attorney/client privilege, and  
20      I think at this point, if we were to discuss this, I think  
21      if we could seal the courtroom, and we could --

22          **THE COURT:** I'm not going to seal the  
23      courtroom. I haven't discussed anything that could  
24      reasonably be characterized as attorney/client privilege.

25               All I'm talking about is a link to a Dropbox.

1 That's it. I'm not asking about the content of the  
2 Dropbox, and I'm not going to seal the courtroom.

3 All I want to know is, can you tell me where  
4 the documents located in the Dropbox are? Were they  
5 produced? That's all I'm looking for.

6 **MR. CHONG:** I guess I would have to go and see  
7 if that link is still active. I don't know.

8 **THE COURT:** So you don't know. So it doesn't  
9 sound like you're in a position to say that you really  
10 have done anything other than obtain oral confirmation  
11 from Ms. LaPray that Backertop's document production is  
12 complete; is that fair?

13 **MR. CHONG:** From Ms. LaPray, Mr. Burns,  
14 Mavexar. And I had, you know, went through the  
15 attachments as of the last hearing and produced the  
16 attachments from my e-mails that I had in my possession.

17 And other than that, I don't have access to  
18 their Internet system, so I cannot access their Internet  
19 system, so I can just only produce what I have and ask  
20 them.

21 **THE COURT:** All right. But you've produced all  
22 the attachments to the e-mails that you've produced; is  
23 that fair?

24 **MR. CHONG:** Yes, that is correct.

25 **THE COURT:** Okay. All right. Anything else

1       you wish to say?

2                   **MR. CHONG:** No, Your Honor.

3                   **THE COURT:** All right. So then, we'll have the  
4       hearing, we said it's going to be on August 1st at  
5       10:00 a.m., a good cause hearing to show why Ms. LaPray  
6       should not be held in civil contempt.

7                   Anything else?

8                   **MR. FINGER:** I may know the answer to this  
9       already, but I wanted to confirm. Tomorrow, we have the  
10      Creekview hearing. Your Honor, we may need to make a  
11      record, but my question is, do we need to go through it  
12      other than, I guess Your Honor might need to make a record  
13      for whatever other action Your Honor is going to take.

14                  I don't think the information you're going to  
15      receive is going to be any different. Not that I'm  
16      opposed to visiting the Court.

17                  **THE COURT:** I see. So you're, basically,  
18      saying, I mean, that there's a -- they're obviously, they  
19      proceeded along a different calendar.

20                  **MR. FINGER:** Correct.

21                  **THE COURT:** And outstanding now in Creekview is  
22      just an order requiring Jacob LaPray to come to court.

23                  **MR. FINGER:** Correct. And to the extent Your  
24      Honor concludes the documents are incomplete, my client,  
25      in this case, Creekview, isn't going to be producing any



1 further documents.

2 **THE COURT:** Well, then, so, yes, then I guess  
3 why not just hold the hearings together. You want to set  
4 it for the same date?

5 **MR. FINGER:** Sure.

6 **THE COURT:** We'll do that. We'll cancel  
7 tomorrow's hearing. We'll just set for August 1st, at  
8 10:00 a.m., then, a hearing to offer Mr. LaPray an  
9 opportunity to show good cause why he should not be held  
10 in civil contempt.

11 Let me just ask you, Mr. Finger, under your  
12 legal theory, how could a Federal District Court ever have  
13 a natural person appear on behalf of a corporate entity  
14 when that corporate entity does not have a natural person  
15 within its employ or ownership that falls within 100 miles  
16 of the state in which the District Court is located?

17 **MR. FINGER:** It can be a cumbersome process.  
18 And I'm spit-balling it to be honest with Your Honor.

19 **THE COURT:** Well, under your theory, it could  
20 never happen, right?

21 **MR. FINGER:** Well, that could be if, for  
22 example, Your Honor has had the option of having her  
23 appear by video. Your Honor denied that request. But  
24 that is one thing that might have not led to this.

25 But in a larger sense, Your Honor could appoint

1 someone, appoint a lawyer or speak to a Court in that  
2 foreign jurisdiction and engage its assistance in a  
3 specific aspect of this.

4 The question here is really the travel or it  
5 was previously. So as I said, it's not -- I can't say  
6 that there's a way to get them physically here, but there  
7 are ways to take testimony.

8 **THE COURT:** It will be a very narrow issue,  
9 then. You're saying it's really -- this is solely about  
10 travel; that's what your position is now?

11 **MR. FINGER:** Well, I mean, it's travel and  
12 inconvenience. And not -- and I don't say inconvenience  
13 like you stubbed your toe.

14 I mean, like her affidavit has previously  
15 shown, she has child care. She has -- this is a  
16 layperson, you know, not a CEO from a major corporation.  
17 And it's imposing. Of course, it's imposing on anyone to  
18 get called to come to court. It's simply someone who is  
19 miles, well over 100 miles away.

20 That certainly was -- the goal was to minimize  
21 her inconvenience, and, again, I don't -- it's not a small  
22 inconvenience -- by having an alternative to her coming  
23 here.

24 But when Your Honor denied that, sort of was --  
25 triggered what's before Your Honor now.

1           **THE COURT:** Right. Your papers go much broader  
2       than -- in their arguments and in their challenges to the  
3       Court's authority than simply repeating a request to  
4       appear alternatively by video.

5           But I've addressed all that in my rulings, and  
6       I don't think it's, as I've stated in my opinion, that  
7       it's unduly or unfairly burdensome.

8           And you're right. Your client may not be the  
9       CEO of a major corporation, but she's the sole managing  
10      member and owner of this LLC. And she apparently plays a  
11      similar role in other LLCs that have brought over 90  
12      lawsuits across the country in our Federal courts.

13          I don't think it's too much ask that she spend  
14      what looks to be about \$300 and miss one day, not even an  
15      entire 24-hour day, to come to court to answer important  
16      questions.

17          And as I say, as I said in the opinion, it's,  
18      especially given just the unusual nature of this case,  
19      this situation between Mr. Burns and Mr. Chong, and it  
20      seems especially important.

21          And given all the other matters that I've  
22      raised as concerns and the Federal Circuit has upheld as  
23      legitimate concerns, it seems entirely appropriate and  
24      really necessary, in my view, to assess the credibility of  
25      that person in person.

1           **MR. FINGER:** I understand and respect Your  
2 Honor's position, but the point about being narrow, the  
3 objection doesn't just deal with the travel. It deals  
4 with the overall process.

5           **THE COURT:** Well, the order requires her  
6 appearance --

7           **MR. FINGER:** I understand, Your Honor --

8           **THE COURT:** -- that's what the order is all  
9 about.

10          **MR. FINGER:** -- but the order is not the only  
11 thing they objected to. But thank you, Your Honor.

12          **THE COURT:** All right. So I'll see you all on  
13 August 1st.

14          **MR. FINGER:** I'm 90 percent sure it is  
15 workable, but I will contact the Court immediately if  
16 there's a problem.

17          **THE COURT:** All right. Thank you. We are  
18 adjourned.

19                   (The proceedings concluded at 1:26 p.m.)  
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CERTIFICATE OF COURT REPORTER

I hereby certify that the foregoing is a true and accurate transcript from my stenographic notes in the proceeding.

/s/ Bonnie R. Archer  
Bonnie R. Archer  
Official Court Reporter  
U.S. District Court

<p><b>MR. CHONG:</b> [16] 5/9 11/17 11/23 12/14 12/17 12/25 13/8 13/22 14/4 14/9 14/12 14/18 15/6 15/13 15/24 16/2 <b>MR. FINGER:</b> [45] <b>THE COURT:</b> [62]</p>	<p><b>1st</b> [5] 7/19 8/12 16/4 17/7 20/13 <b>2</b> <b>20</b> [1] 1/16 <b>2023</b> [1] 1/16 <b>20th</b> [2] 7/5 7/10 <b>21st</b> [2] 7/10 7/11 <b>24-hour</b> [1] 19/15 <b>26</b> [1] 14/5 <b>28</b> [1] 14/15</p>	<p><b>access</b> [2] 15/17 15/18 <b>accurate</b> [1] 21/5 <b>across</b> [1] 19/12 <b>acting</b> [1] 10/14 <b>action</b> [1] 16/13 <b>active</b> [1] 15/7 <b>actually</b> [2] 8/15 13/6 <b>add</b> [1] 3/12 <b>added</b> [1] 4/22 <b>adding</b> [1] 4/23 <b>addressed</b> [1] 19/5 <b>adjourned</b> [1] 20/18 <b>advise</b> [1] 10/24 <b>affidavit</b> [1] 18/14 <b>afforded</b> [3] 6/15 6/15 9/9 <b>afternoon</b> [2] 3/6 5/10 <b>again</b> [3] 6/18 10/14 18/21 <b>age</b> [1] 12/16 <b>ago</b> [1] 12/8 <b>agreement</b> [1] 12/20</p>	<p><b>agreements</b> [1] 12/22 <b>ahead</b> [1] 3/8 <b>all</b> [29] <b>along</b> [1] 16/19 <b>already</b> [5] 3/23 3/25 4/15 8/20 16/9 <b>also</b> [2] 10/13 10/25 <b>alternative</b> [1] 18/22 <b>alternatively</b> [1] 19/4 <b>although</b> [1] 11/11 <b>am</b> [1] 3/9 <b>another</b> [1] 12/18 <b>answer</b> [4] 3/13 11/8 16/8 19/15 <b>any</b> [6] 4/21 7/15 10/17 14/3 16/15 16/25 <b>anyone</b> [1] 18/17 <b>anything</b> [8] 4/18 8/16 11/21 13/21 14/23 15/10 15/25 16/7 <b>anyway</b> [1] 10/12 <b>apologize</b> [1] 6/10</p>
\$	<b>4</b>	<b>add</b> [1] 3/12	<b>alternatively</b> [1] 19/4
\$300 [1] 19/14	<b>4th</b> [2] 6/5 7/4	<b>added</b> [1] 4/22	<b>although</b> [1] 11/11
-	<b>8</b>	<b>adding</b> [1] 4/23	<b>am</b> [1] 3/9
-and [1] 2/4	<b>844</b> [1] 1/19	<b>addressed</b> [1] 19/5	<b>another</b> [1] 12/18
/	<b>9</b>	<b>adjoined</b> [1] 20/18	<b>answer</b> [4] 3/13 11/8
/s [1] 21/7	<b>90</b> [1] 19/11	<b>advise</b> [1] 10/24	16/8 19/15
<b>1</b>	<b>90 percent</b> [1] 20/14	<b>affidavit</b> [1] 18/14	<b>any</b> [6] 4/21 7/15 10/17
<b>100 miles</b> [2] 17/15 18/19	<b>A</b>	<b>afforded</b> [3] 6/15 6/15	14/3 16/15
<b>10:00 a.m</b> [3] 8/12 16/5	<b>a.m</b> [3] 8/12 16/5 17/8	<b>afforded</b> [3] 6/15 6/15	16/25
17/8	<b>about</b> [13] 4/18 8/11	<b>afforded</b> [3] 6/15 6/15	<b>anyone</b> [1] 18/17
<b>10th</b> [1] 6/2	10/7 11/11	<b>afternoon</b> [2] 3/6 5/10	<b>anything</b> [8] 4/18 8/16
<b>12th</b> [2] 6/5 7/4	11/12 11/16	<b>again</b> [3] 6/18 10/14	11/21 13/21
<b>1:00</b> [3] 1/16 3/4 6/3	13/21 14/25	<b>again</b> [3] 6/18 10/14	14/23 15/10
<b>1:22-cv-00573</b>	15/1 18/9	<b>ago</b> [1] 12/16	15/25 16/7
<b>-CFC</b> [1] 1/5	19/14 20/2	<b>age</b> [1] 12/16	<b>anyway</b> [1] 10/12
<b>1:22-cv-0572-</b>	20/9	<b>ago</b> [1] 12/8	<b>apologize</b> [1] 6/10
<b>CFC</b> [1] 1/10	<b>accept</b> [2]	<b>agreement</b> [1] 12/20	

<p><b>A</b></p> <p><b>apparent</b> [1] 10/6</p> <p><b>apparently</b> [2] 12/11 19/10</p> <p><b>appear</b> [3] 17/13 17/23 19/4</p> <p><b>appearance</b> [1] 20/6</p> <p><b>APPEARANCES</b> [1] 2/1</p> <p><b>appears</b> [1] 9/15</p> <p><b>appoint</b> [2] 17/25 18/1</p> <p><b>approaching</b> [1] 3/19</p> <p><b>appropriate</b> [1] 19/23</p> <p><b>Archer</b> [2] 21/7 21/8</p> <p><b>are</b> [12] 3/8 4/1 4/4 6/16 7/3 9/7 9/23 14/16 15/4 16/24 18/7 20/17</p> <p><b>arguing</b> [1] 6/21</p> <p><b>arguments</b> [2] 6/24 19/2</p> <p><b>around</b> [1] 7/5</p> <p><b>as</b> [15] 3/22 4/20 4/20 5/25 9/3 9/21 13/15</p>	<p>14/24 15/15 18/5 19/6 19/17 19/17 19/22 19/22</p> <p><b>ask</b> [5] 11/10 11/15 15/19 17/11 19/13</p> <p><b>asking</b> [2] 7/25 15/1</p> <p><b>aspect</b> [1] 18/3</p> <p><b>assertion</b> [1] 12/23</p> <p><b>assess</b> [1] 19/24</p> <p><b>assistance</b> [1] 18/2</p> <p><b>assuming</b> [1] 3/10</p> <p><b>at1:26</b> [1] 20/19</p> <p><b>attached</b> [1] 13/17</p> <p><b>attachment</b> [2] 14/7 14/12</p> <p><b>attachments</b> [4] 9/22 15/15 15/16 15/22</p> <p><b>attention</b> [1] 8/20</p> <p><b>attorney</b> [3] 11/24 14/19 14/24</p> <p><b>attorney/client</b> [2] 14/19 14/24</p> <p><b>AUGUST</b> [7]</p>	<p>1/7/2 7/19 8/12 16/4 17/7 20/13</p> <p><b>August 10th</b> [1] 6/2</p> <p><b>August 1st</b> [5] 7/19 8/12 16/4 17/7 20/13</p> <p><b>authority</b> [1] 19/3</p> <p><b>away</b> [3] 7/3 7/19 18/19</p> <p><b>B</b></p> <p><b>back</b> [4] 3/21 13/1 13/9 13/20</p> <p><b>BACKERTOP</b> [8] 1/4 1/9 4/6 9/16 10/19 11/20 12/21 14/17</p> <p><b>Backertop's</b> [3] 11/2 11/18 15/11</p> <p><b>background</b> [1] 3/16</p> <p><b>balling</b> [1] 17/18</p> <p><b>bar</b> [2] 5/19 6/10</p> <p><b>basically</b> [2] 6/21 16/17</p> <p><b>be</b> [29]</p> <p><b>because</b> [2] 6/7 7/25</p> <p><b>been</b> [2] 6/12 11/12</p> <p><b>before</b> [3]</p>	<p>1/21 7/19 18/25</p> <p><b>beginning</b> [1] 3/3</p> <p><b>behalf</b> [1] 17/13</p> <p><b>being</b> [1] 20/2</p> <p><b>believe</b> [3] 10/23 13/10 14/19</p> <p><b>benefit</b> [1] 9/25</p> <p><b>bet</b> [1] 7/11</p> <p><b>better</b> [1] 11/8</p> <p><b>between</b> [3] 12/20 13/15 19/19</p> <p><b>beyond</b> [1] 4/1</p> <p><b>bit</b> [2] 3/16 6/6</p> <p><b>Bonnie</b> [2] 21/7 21/8</p> <p><b>broader</b> [1] 19/1</p> <p><b>brought</b> [2] 8/20 19/11</p> <p><b>burdensome</b> [1] 19/7</p> <p><b>Burn's</b> [1] 3/19</p> <p><b>Burns</b> [8] 3/20 4/8 9/22 11/24 14/6 14/16 15/13 19/19</p> <p><b>bus</b> [1] 11/7</p> <p><b>business</b> [1]</p>
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<p><b>C</b></p> <p><b>C.A [2]</b> 1/5 1/10</p> <p><b>calendar [2]</b> 6/7 16/19</p> <p><b>called [1]</b> 18/18</p> <p><b>came [1]</b> 5/11</p> <p><b>can [7]</b> 6/6 7/14 11/15 11/19 15/3 15/19 17/17</p> <p><b>can't [4]</b> 6/6 6/9 9/19 18/5</p> <p><b>CANARY [1]</b> 1/12</p> <p><b>cancel [1]</b> 17/6</p> <p><b>candor [2]</b> 10/23 11/1</p> <p><b>cannot [1]</b> 15/18</p> <p><b>card [1]</b> 6/10</p> <p><b>care [1]</b> 18/15</p> <p><b>case [3]</b> 10/14 16/25 19/18</p> <p><b>cases [2]</b> 10/1 10/2</p> <p><b>cause [5]</b></p>	<p><b>CERTIFICATE [1]</b> 21/2</p> <p><b>certify [1]</b> 21/4</p> <p><b>CFC [2]</b> 1/5 1/10</p> <p><b>challenges [1]</b> 19/2</p> <p><b>chance [1]</b> 14/3</p> <p><b>Chancery [1]</b> 7/6</p> <p><b>change [1]</b> 8/19</p> <p><b>changed [1]</b> 4/21</p> <p><b>characterized [1]</b> 14/24</p> <p><b>check [1]</b> 13/2</p> <p><b>child [1]</b> 18/15</p> <p><b>CHONG [12]</b> 2/2 2/3 3/7 5/6 5/8 5/17 5/18 9/22 11/10 11/11 11/15 19/19</p> <p><b>Circuit [1]</b> 19/22</p> <p><b>civil [3]</b> 8/23 16/6 17/10</p>	<p><b>clear [2]</b> 4/18 10/2</p> <p><b>Clearly [1]</b> 8/24</p> <p><b>client [5]</b> 9/16 14/19 14/24 16/24 19/8</p> <p><b>clients [3]</b> 4/1 4/3 4/4</p> <p><b>coercive [1]</b> 8/23</p> <p><b>COLM [1]</b> 1/21</p> <p><b>come [3]</b> 16/22 18/18 19/15</p> <p><b>coming [1]</b> 18/22</p> <p><b>commenced [1]</b> 3/3</p> <p><b>common [1]</b> 10/4</p> <p><b>communication s [2]</b> 10/7 10/8</p> <p><b>company [1]</b> 10/11</p> <p><b>complete [1]</b> 15/12</p> <p><b>compliance [2]</b> 11/19 12/2</p> <p><b>complied [1]</b> 9/16</p> <p><b>comply [1]</b> 8/24</p> <p><b>comport [1]</b> 8/18</p> <p><b>concerns [2]</b></p>	<p><b>concluded [1]</b> 20/19</p> <p><b>concludes [1]</b> 16/24</p> <p><b>conducted [1]</b> 10/9</p> <p><b>confidential [1]</b> 12/19</p> <p><b>confirm [2]</b> 11/20 16/9</p> <p><b>confirmation [1]</b> 15/10</p> <p><b>conflict [1]</b> 7/15</p> <p><b>Congratulation ns [2]</b> 8/1 8/9</p> <p><b>CONNECT [1]</b> 1/12</p> <p><b>connection [1]</b> 9/3</p> <p><b>CONNOLLY [1]</b> 1/21</p> <p><b>consistent [1]</b> 10/20</p> <p><b>consistently [1]</b> 10/15</p> <p><b>contact [1]</b> 20/15</p> <p><b>contempt [7]</b> 6/1 6/22 8/23 9/3 9/11 16/6 17/10</p> <p><b>content [1]</b> 15/1</p> <p><b>contents [1]</b> 12/12</p> <p><b>contest [1]</b></p>



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<p><b>done</b> [2] 4/15 15/10</p> <p><b>drive</b> [1] 4/15</p> <p><b>Dropbox</b> [7] 12/16 12/17 14/15 14/17 14/25 15/2 15/4</p> <p><b>due</b> [1] 8/18</p> <p><b>duplicative</b> [1] 5/14</p> <p><b>during</b> [1] 12/22</p>	<p><b>end</b> [3] 11/3 11/3</p> <p><b>ended</b> [1] 13/18</p> <p><b>engage</b> [1] 18/2</p> <p><b>engagement</b> [2] 13/13 13/19</p> <p><b>enough</b> [1] 7/23</p> <p><b>entire</b> [1] 19/15</p> <p><b>entirely</b> [1] 19/23</p> <p><b>entity</b> [2] 17/13 17/14</p> <p><b>especially</b> [3] 10/11 19/18 19/20</p> <p><b>ESQ</b> [2] 2/3 2/5</p> <p><b>even</b> [3] 6/9 11/4 19/14</p> <p><b>ever</b> [1] 17/12</p> <p><b>everything</b> [7] 10/9 10/22 12/1 12/1 13/3 13/23 13/24</p> <p><b>example</b> [2] 12/18 17/22</p> <p><b>executed</b> [1] 13/20</p> <p><b>expect</b> [3] 10/7 10/16 13/14</p> <p><b>explain</b> [1] 3/15</p>	<p><b>explaining</b> [1] 4/13</p> <p><b>explanation</b> [1] 4/21</p> <p><b>extent</b> [1] 16/23</p> <p><b>F</b></p> <p><b>fact</b> [1] 10/19</p> <p><b>fair</b> [2] 15/12 15/23</p> <p><b>falls</b> [1] 17/15</p> <p><b>far</b> [1] 4/20</p> <p><b>fashion</b> [1] 4/14</p> <p><b>Federal</b> [3] 17/12 19/12 19/22</p> <p><b>felt</b> [2] 3/21 5/1</p> <p><b>few</b> [1] 12/8</p> <p><b>file</b> [1] 6/17</p> <p><b>filed</b> [4] 3/10 9/2 12/6 13/4</p> <p><b>find</b> [1] 12/2</p> <p><b>fine</b> [1] 8/5</p> <p><b>FINGER</b> [5] 2/5 2/5 3/7 3/8 17/11</p> <p><b>firm</b> [5] 2/2 12/21 13/16 14/9 14/12</p> <p><b>first</b> [2] 8/3 12/20</p> <p><b>folks</b> [2]</p>	<p><b>foregoing</b> [1] 21/4</p> <p><b>foreign</b> [1] 18/2</p> <p><b>friend</b> [1] 11/7</p> <p><b>front</b> [2] 13/6 14/2</p> <p><b>further</b> [1] 17/1</p> <p><b>G</b></p> <p><b>game</b> [3] 11/3 11/3 11/3</p> <p><b>get</b> [9] 3/24 5/19 6/6 8/7 8/24 10/21 12/7 18/6 18/18</p> <p><b>getting</b> [4] 7/25 8/3 8/4 13/19</p> <p><b>give</b> [3] 3/21 7/23 12/18</p> <p><b>given</b> [7] 5/16 6/20 9/7 9/8 9/10 19/18 19/21</p> <p><b>go</b> [9] 3/8 4/1 6/8 7/19 13/1 13/9 15/6 16/11 19/1</p> <p><b>goal</b> [1] 18/20</p> <p><b>going</b> [16] 6/17 8/2 8/3</p>
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<p><b>G</b></p> <p><b>going...</b> [13]  8/19 8/22  9/7 9/8 9/9  9/10 14/22  15/2 16/4  16/13 16/14  16/15 16/25</p> <p><b>good</b> [6] 3/6  5/25 6/16  9/11 16/5  17/9</p> <p><b>got</b> [7] 5/12  12/4 12/19  13/13 13/15  13/16 13/20</p> <p><b>guess</b> [6]  6/25 11/11  14/18 15/6  16/12 17/2</p>	<p>3/10 5/3  9/16 11/12  14/17 17/22  18/14 18/15  18/15 19/22</p> <p><b>have</b> [27]  <b>haven't</b> [4]  6/12 6/20  8/20 14/23</p> <p><b>having</b> [2]  17/22 18/22</p> <p><b>he</b> [7] 4/13  4/14 4/20  5/3 11/7  11/8 17/9</p> <p><b>he's</b> [1]  4/15</p> <p><b>head</b> [1]  13/11</p> <p><b>hearing</b> [12]  1/17 4/6  5/25 6/16  9/15 13/6  15/15 16/4  16/5 16/10  17/7 17/8</p> <p><b>hearings</b> [2]  12/23 17/3</p> <p><b>held</b> [4] 6/1  9/11 16/6  17/9</p> <p><b>helpful</b> [1]  10/21</p> <p><b>her</b> [8] 8/23  8/24 13/20  17/22 18/14  18/21 18/22  20/5</p> <p><b>here</b> [9]  3/14 4/7</p>	<p>10/6 12/13  12/24 14/7  18/4 18/6  18/23</p> <p><b>here's</b> [3]  7/18 14/15  14/16</p> <p><b>hereby</b> [1]  21/4</p> <p><b>him</b> [3] 3/24  4/9 4/13</p> <p><b>his</b> [7] 3/20  3/23 4/10  4/18 14/9  14/9 14/12</p> <p><b>hold</b> [2]  8/23 17/3</p> <p><b>HOME</b> [1] 1/7</p> <p><b>honest</b> [1]  17/18</p> <p><b>Honor</b> [38]  <b>Honor's</b> [2]  3/13 20/2</p> <p><b>HONORABLE</b> [1]  1/21</p> <p><b>hopefully</b> [1]  7/7</p> <p><b>hour</b> [3] 5/7  12/5 19/15</p> <p><b>how</b> [11] 3/8  3/19 6/13  8/11 12/23  13/15 13/16  13/18 13/19  13/20 17/12</p>	<p>4/17 5/10  6/4 7/14  7/24 7/25  8/4 8/15  8/22 9/9  10/17 10/18  14/22 14/25  15/1 15/2  15/5 16/15  17/18 20/14</p> <p><b>I've</b> [5]  4/22 13/13  19/5 19/6  19/21</p> <p><b>illustrative</b>  [1] 5/2</p> <p><b>image</b> [2]  14/7 14/7</p> <p><b>image 1</b> [1]  14/7</p> <p><b>image 2</b> [1]  14/7</p> <p><b>imagine</b> [1]  8/22</p> <p><b>immediately</b>  [1] 20/15</p> <p><b>important</b> [2]  19/15 19/20</p> <p><b>impose</b> [1]  8/23</p> <p><b>imposing</b> [2]  18/17 18/17</p> <p><b>INC</b> [2] 1/7  1/12</p> <p><b>included</b> [1]  9/24</p> <p><b>incomplete</b>  [1] 16/24</p> <p><b>inconvenience</b>  [4] 18/12</p>
<p><b>H</b></p> <p><b>had</b> [8] 3/20  5/9 10/13  10/19 11/20  15/14 15/16  17/22</p> <p><b>half</b> [1] 7/6</p> <p><b>half-day</b> [1]  7/6</p> <p><b>hand</b> [1] 5/9</p> <p><b>hands</b> [1]  13/19</p> <p><b>hanging</b> [1]  10/18</p> <p><b>happen</b> [1]  17/20</p> <p><b>happy</b> [1]  7/14</p> <p><b>has</b> [10]</p>		<p><b>I</b></p> <p><b>I'll</b> [2]  7/11 20/12</p> <p><b>I'm</b> [21] 4/5</p>	

<p><b>inconvenience</b> ... [3] 18/12 18/21 18/22</p> <p><b>inform</b> [1] 7/16</p> <p><b>information</b> [2] 14/18 16/14</p> <p><b>informing</b> [1] 14/16</p> <p><b>inquire</b> [1] 11/9</p> <p><b>instance</b> [3] 9/21 10/19 12/3</p> <p><b>instances</b> [1] 12/10</p> <p><b>instructed</b> [2] 4/8 12/7</p> <p><b>Internet</b> [2] 15/18 15/18</p> <p><b>introduced</b> [1] 13/5</p> <p><b>invalid</b> [1] 6/23</p> <p><b>investigate</b> [1] 10/24</p> <p><b>IP</b> [1] 14/16</p> <p><b>IP Edge</b> [1] 14/16</p> <p><b>is</b> [58]</p> <p><b>isn't</b> [2] 8/19 16/25</p> <p><b>issue</b> [2] 4/19 18/8</p> <p><b>issues</b> [1]</p>	<p><b>it</b> [48]</p> <p><b>it's</b> [25]</p> <p><b>its</b> [2] 17/15 18/2</p> <p><b>J</b></p> <p><b>Jacob</b> [1] 16/22</p> <p><b>JIMMY</b> [1] 2/3</p> <p><b>Judge</b> [1] 1/21</p> <p><b>July</b> [2] 1/16 8/5</p> <p><b>June</b> [1] 9/15</p> <p><b>jurisdiction</b> [1] 18/2</p> <p><b>just</b> [26]</p> <p><b>justification</b> [1] 8/19</p> <p><b>K</b></p> <p><b>King</b> [1] 1/19</p> <p><b>knew</b> [1] 10/19</p> <p><b>know</b> [12] 4/15 5/14 6/18 11/2 11/21 14/1 15/3 15/7 15/8 15/14 16/8 18/16</p> <p><b>knows</b> [1] 7/5</p> <p><b>L</b></p> <p><b>LaPray</b> [13] 3/14 5/21</p>	<p>11/22 11/24 12/11 13/16 15/11 15/13 16/5 16/22 17/8</p> <p><b>LaPray's</b> [2] 11/3 13/19</p> <p><b>largely</b> [1] 11/12</p> <p><b>larger</b> [1] 17/25</p> <p><b>last</b> [4] 5/7 9/22 12/5 15/15</p> <p><b>late</b> [1] 8/5</p> <p><b>later</b> [1] 6/6</p> <p><b>law</b> [3] 2/2 12/20 13/16</p> <p><b>lawsuits</b> [1] 19/12</p> <p><b>lawyer</b> [1] 18/1</p> <p><b>layperson</b> [1] 18/16</p> <p><b>least</b> [3] 10/13 12/10 14/8</p> <p><b>led</b> [1] 17/24</p> <p><b>left</b> [1] 11/12</p> <p><b>legal</b> [1] 17/12</p> <p><b>legitimate</b> [1] 19/23</p> <p><b>Let</b> [4] 4/1 7/13 12/18 17/11</p>	<p><b>let's</b> [1] 13/12</p> <p><b>letter</b> [5] 3/19 4/12 13/7 13/13 13/19</p> <p><b>license</b> [1] 8/4</p> <p><b>LICENSING</b> [3] 1/4 1/9 4/6</p> <p><b>light</b> [1] 9/13</p> <p><b>like</b> [6] 8/14 13/9 14/5 15/9 18/13 18/14</p> <p><b>link</b> [4] 12/10 14/16 14/25 15/7</p> <p><b>little</b> [3] 3/16 5/1 6/6</p> <p><b>LLC</b> [3] 1/4 1/9 19/10</p> <p><b>LLCs</b> [2] 10/15 19/11</p> <p><b>located</b> [2] 15/4 17/16</p> <p><b>lockbox</b> [4] 12/10 12/13 12/14 12/15</p> <p><b>logo</b> [2] 14/10 14/13</p> <p><b>long</b> [1] 6/13</p> <p><b>look</b> [3] 8/17 13/9 14/2</p> <p><b>looking</b> [2] 12/9 15/5</p> <p><b>looks</b> [1]</p>
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<p><b>L</b></p> <p><b>looks...</b> [1] 19/14</p> <p><b>lot</b> [3] 6/20 8/7 11/12</p>	<p><b>may</b> [7] 6/4 6/16 11/8 12/6 16/8 16/10 19/8</p>	<p><b>Mr. Burns</b> [1] 3/19</p>	<p><b>natural</b> [2] 17/13 17/14</p>
<p><b>M</b></p> <p><b>made</b> [2] 6/24 11/20</p>	<p><b>me</b> [9] 5/24 7/13 9/13 11/19 11/25 12/18 13/6 15/3 17/11</p>	<p><b>Mr. Burns</b> [7] 3/20 4/8 9/22 14/6 14/16 15/13 19/19</p>	<p><b>nature</b> [1] 19/18</p>
<p><b>mail</b> [3] 13/14 13/23 14/6</p>	<p><b>mean</b> [8] 11/6 11/23 13/9 13/18 13/22 16/18 18/11 18/14</p>	<p><b>Mr. Chong</b> [10] 3/7 5/6 5/8 5/17 5/18 9/22 11/10 11/11 11/15 19/19</p>	<p><b>need</b> [3] 16/10 16/11 16/12</p>
<p><b>mails</b> [4] 9/23 9/24 15/16 15/22</p>	<p><b>measures</b> [1] 8/23</p>	<p><b>Mr. Finger</b> [3] 3/7 3/8 17/11</p>	<p><b>never</b> [1] 17/20</p>
<p><b>major</b> [2] 18/16 19/9</p>	<p><b>member</b> [2] 5/19 19/10</p>	<p><b>Mr. LaPray</b> [1] 17/8</p>	<p><b>next</b> [1] 14/14</p>
<p><b>make</b> [5] 6/6 6/14 8/17 16/10 16/12</p>	<p><b>messages</b> [2] 10/13 10/16</p>	<p><b>Ms</b> [8] 11/3 11/22 11/24 13/16 13/19 15/11 15/13 16/5</p>	<p><b>no</b> [10] 1/5 1/10 8/19 10/5 10/6 12/23 13/7 13/7 13/13 16/2</p>
<p><b>making</b> [1] 10/17</p>	<p><b>might</b> [2] 16/12 17/24</p>	<p><b>Ms. [5]</b> 3/14 5/21 6/15 9/8 12/11</p>	<p><b>normal</b> [1] 10/5</p>
<p><b>managing</b> [1] 19/9</p>	<p><b>miles</b> [3] 17/15 18/19 18/19</p>	<p><b>Ms. LaPray</b> [5] 3/14 5/21 6/15 9/8 12/11</p>	<p><b>not</b> [36] <b>notes</b> [1] 21/5</p>
<p><b>marriage</b> [1] 8/4</p>	<p><b>mind</b> [1] 4/21</p>	<p><b>much</b> [3] 3/12 19/1 19/13</p>	<p><b>nothing</b> [2] 13/14 13/17</p>
<p><b>married</b> [1] 7/25</p>	<p><b>minimize</b> [1] 18/20</p>	<p><b>must</b> [1] 10/2</p>	<p><b>now</b> [6] 4/8 6/25 9/13 16/21 18/10 18/25</p>
<p><b>matters</b> [2] 10/7 19/21</p>	<p><b>minutes</b> [1] 12/8</p>	<p><b>my</b> [22]</p>	<p><b>O</b></p>
<p><b>Mavexar</b> [6] 10/1 10/15 11/22 11/23 12/12 15/14</p>	<p><b>miss</b> [1] 19/14</p>	<p><b>N</b></p>	<p><b>objected</b> [1] 20/11</p>
<p><b>Mavexar's</b> [1] 11/3</p>	<p><b>missing</b> [1] 9/23</p>	<p><b>narrow</b> [2] 18/8 20/2</p>	<p><b>objection</b> [5] 3/10 6/25 9/2 13/7 20/3</p>
<p><b>Mavexar-relat</b> <b>ed</b> [1] 10/15</p>	<p><b>Monday</b> [2] 7/11 7/12</p>		<p><b>obtain</b> [1] 15/10</p>
<p><b>Mavexar-type</b> [1] 12/12</p>	<p><b>more</b> [2] 5/1 11/21</p>		
	<p><b>Mr.</b> [22]</p>		

<p><b>obviously</b> [1] 16/18</p> <p><b>off</b> [1] 13/10</p> <p><b>offer</b> [1] 17/8</p> <p><b>Official</b> [1] 21/8</p> <p><b>Oh</b> [5] 4/23 4/25 8/1 8/4 12/17</p> <p><b>okay</b> [12] 3/25 4/9 5/3 5/12 5/16 6/11 7/2 8/6 9/6 13/12 14/11 15/25</p> <p><b>once</b> [1] 10/22</p> <p><b>one</b> [4] 3/20 10/13 17/24 19/14</p> <p><b>only</b> [4] 6/25 7/24 15/19 20/10</p> <p><b>open</b> [2] 6/10 7/15</p> <p><b>opinion</b> [2] 19/6 19/17</p> <p><b>opportunity</b> [3] 9/8 9/10 17/9</p> <p><b>opposed</b> [1] 16/16</p> <p><b>option</b> [2] 3/21 17/22</p> <p><b>oral</b> [1] 15/10</p>	<p><b>order</b> [11] 3/22 6/22 8/24 9/12 9/17 10/20 12/2 16/22 20/5 20/8 20/10</p> <p><b>ordered</b> [1] 5/9</p> <p><b>organized</b> [1] 6/25</p> <p><b>original</b> [1] 4/11</p> <p><b>other</b> [11] 3/13 9/25 10/1 10/14 11/2 15/10 15/17 16/12 16/13 19/11 19/21</p> <p><b>ought</b> [1] 5/25</p> <p><b>our</b> [3] 8/14 9/3 19/12</p> <p><b>out</b> [2] 8/5 10/18</p> <p><b>outstanding</b> [1] 16/21</p> <p><b>over</b> [4] 4/9 5/17 18/19 19/11</p> <p><b>overall</b> [1] 20/4</p> <p><b>oversimplifie</b> <b>d</b> [1] 3/18</p> <p><b>owner</b> [1] 19/10</p> <p><b>ownership</b> [1] 17/15</p>	<p><b>p.m</b> [3] 1/16 3/4 20/19</p> <p><b>PA</b> [1] 2/2</p> <p><b>page</b> [3] 14/5 14/15 14/15</p> <p><b>Page 26</b> [1] 14/5</p> <p><b>Page 28</b> [1] 14/15</p> <p><b>papers</b> [1] 19/1</p> <p><b>participating</b> [1] 4/2</p> <p><b>particularly</b> [1] 5/19</p> <p><b>parties</b> [1] 10/14</p> <p><b>people</b> [1] 12/12</p> <p><b>percent</b> [1] 20/14</p> <p><b>permission</b> [1] 5/17</p> <p><b>person</b> [4] 17/13 17/14 19/25 19/25</p> <p><b>phone</b> [1] 10/10</p> <p><b>physically</b> [1] 18/6</p> <p><b>Plaintiff</b> [3] 1/5 1/10 2/7</p> <p><b>plays</b> [1] 19/10</p> <p><b>Please</b> [1] 3/6</p>	<p><b>plural</b> [1] 4/3</p> <p><b>point</b> [3] 10/12 14/20 20/2</p> <p><b>position</b> [5] 8/18 11/8 15/9 18/10 20/2</p> <p><b>possession</b> [5] 3/20 3/23 3/25 4/10 15/16</p> <p><b>possible</b> [1] 10/9</p> <p><b>pouch</b> [2] 6/7 6/9</p> <p><b>previously</b> [3] 13/1 18/5 18/14</p> <p><b>privilege</b> [4] 12/23 13/3 14/19 14/24</p> <p><b>privileged</b> [1] 12/24</p> <p><b>problem</b> [1] 20/16</p> <p><b>proceeded</b> [1] 16/19</p> <p><b>proceeding</b> [1] 21/6</p> <p><b>proceedings</b> [2] 3/3 20/19</p> <p><b>process</b> [4] 6/15 8/18 17/17 20/4</p> <p><b>produce</b> [2] 11/7 15/19</p> <p><b>produced</b> [14] 5/4 5/7</p>
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<p><b>produced...</b>  <b>[12]</b> 10/13  10/20 12/1  12/22 12/25  13/1 13/22  13/24 15/5  15/15 15/21  15/22  <b>producing [2]</b>  13/3 16/25  <b>production</b>  <b>[6]</b> 9/17  10/2 12/4  13/17 14/2  15/11  <b>productions</b>  <b>[2]</b> 9/14  10/1  <b>provided [1]</b>  12/11  <b>put [2]</b> 7/13  13/6</p>	<p><b>realize [2]</b>  6/13 12/6  <b>really [5]</b>  10/5 15/9  18/4 18/9  19/24  <b>reasonably</b>  <b>[1]</b> 14/24  <b>reasoning [2]</b>  4/22 5/2  <b>recall [3]</b>  13/8 13/10  13/25  <b>receive [1]</b>  16/15  <b>received [2]</b>  3/15 11/24  <b>record [3]</b>  10/21 16/11  16/12  <b>records [1]</b>  13/2  <b>referenced</b>  <b>[1]</b> 9/23  <b>related [3]</b>  10/1 10/14  10/15  <b>remember [2]</b>  13/18 13/20  <b>repeating [1]</b>  19/3  <b>REPORTER [2]</b>  21/2 21/8  <b>represent [1]</b>  4/5  <b>request [4]</b>  4/11 11/19  17/23 19/3  <b>requires [1]</b></p>	<p><b>requiring [2]</b>  8/15 16/22  <b>respect [1]</b>  20/1  <b>respond [1]</b>  6/21  <b>response [1]</b>  7/1  <b>responsive</b>  <b>[1]</b> 4/10  <b>right [23]</b>  <b>role [1]</b>  19/11  <b>ruling [2]</b>  6/22 10/17  <b>rulings [1]</b>  19/5</p> <hr/> <p><b>S</b>  <b>said [6]</b>  3/25 4/21  7/3 16/4  18/5 19/17  <b>same [4]</b>  5/13 6/24  12/22 17/4  <b>saw [2]</b> 4/12  12/10  <b>say [9]</b> 4/3  9/2 9/19  12/15 15/9  16/1 18/5  18/12 19/17  <b>saying [3]</b>  10/18 16/18  18/9  <b>says [2]</b>  6/17 14/6  <b>seal [3]</b></p>	<p>14/21 14/22  15/2  <b>search [2]</b>  13/23 13/24  <b>searched [1]</b>  11/25  <b>seated [1]</b>  3/6  <b>see [8]</b> 4/25  10/7 12/12  13/15 14/7  15/6 16/17  20/12  <b>seeking [1]</b>  6/22  <b>seems [4]</b>  5/24 11/4  19/20 19/23  <b>seen [2]</b>  9/20 10/16  <b>sense [2]</b>  10/4 17/25  <b>served [1]</b>  11/4  <b>set [7]</b> 5/25  6/16 7/14  7/19 8/11  17/3 17/7  <b>she [7]</b> 6/1  9/10 9/11  18/15 18/15  19/10 19/13  <b>she's [1]</b>  19/9  <b>should [4]</b>  6/1 8/5 16/6  17/9  <b>shouldn't [1]</b>  9/11  <b>show [4]</b></p>
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<p>Case 1:22-cv-00426-CFC Document 24 Filed 07/24/23 Page 32 of 34 PageID #:177</p> <p><b>S</b></p> <p><b>show...</b> [4] 5/22 9/10 16/5 17/9</p> <p><b>showing</b> [2] 6/18 12/16</p> <p><b>shown</b> [1] 18/15</p> <p><b>signatures</b> [1] 13/16</p> <p><b>similar</b> [1] 19/11</p> <p><b>simply</b> [2] 18/18 19/3</p> <p><b>since</b> [3] 3/23 3/24 11/7</p> <p><b>situation</b> [2] 4/19 19/19</p> <p><b>SLANINA</b> [1] 2/5</p> <p><b>small</b> [2] 10/11 18/21</p> <p><b>so</b> [30]</p> <p><b>sole</b> [1] 19/9</p> <p><b>solely</b> [1] 18/9</p> <p><b>some</b> [5] 3/15 4/14 9/14 11/7 11/16</p> <p><b>somebody</b> [1] 11/22</p> <p><b>someone</b> [2] 18/1 18/18</p> <p><b>something</b> [1] 6/17</p> <p><b>sorry</b> [3]</p>	<p>4/5 8/4</p> <p>12/16</p> <p><b>sort</b> [1] 18/24</p> <p><b>sound</b> [1] 15/9</p> <p><b>speak</b> [1] 18/1</p> <p><b>speaking</b> [1] 11/21</p> <p><b>specific</b> [1] 18/3</p> <p><b>specifically</b> [1] 13/25</p> <p><b>spend</b> [1] 19/13</p> <p><b>spit</b> [1] 17/18</p> <p><b>spit-balling</b> [1] 17/18</p> <p><b>spoke</b> [1] 11/23</p> <p><b>state</b> [1] 17/16</p> <p><b>stated</b> [1] 19/6</p> <p><b>STATES</b> [2] 1/1 1/21</p> <p><b>stenographic</b> [1] 21/5</p> <p><b>still</b> [1] 15/7</p> <p><b>Street</b> [1] 1/19</p> <p><b>strike</b> [2] 9/9 9/13</p> <p><b>stubbed</b> [1] 18/13</p> <p><b>submission</b> [1] 9/3</p>	<p><b>sufficiently</b> [1] 5/2</p> <p><b>superior</b> [1] 3/22</p> <p><b>suppose</b> [2] 6/19 10/10</p> <p><b>sure</b> [5] 5/10 6/14 8/18 17/5 20/14</p> <p><b>system</b> [2] 15/18 15/19</p> <p><b>T</b></p> <p><b>tackle</b> [1] 13/12</p> <p><b>take</b> [3] 4/19 16/13 18/7</p> <p><b>talking</b> [1] 14/25</p> <p><b>tell</b> [2] 11/19 15/3</p> <p><b>terms</b> [1] 11/18</p> <p><b>testimony</b> [1] 18/7</p> <p><b>text</b> [2] 10/13 10/16</p> <p><b>than</b> [7] 3/13 11/21 15/10 15/17 16/12 19/2 19/3</p> <p><b>thank</b> [6] 3/9 8/2 8/10 11/14 20/11 20/17</p> <p><b>that</b> [88]</p> <p><b>that's</b> [11]</p>	<p>6/13 7/24</p> <p>10/18 12/15</p> <p>13/3 14/9</p> <p>14/12 15/1</p> <p>15/5 18/10 20/8</p> <p><b>their</b> [5] 4/21 15/18 15/18 19/2 19/2</p> <p><b>them</b> [8] 3/21 4/1 4/16 5/9 5/12 14/7 15/20 18/6</p> <p><b>then</b> [13] 4/17 5/6 5/21 10/4 13/12 13/12 14/1 14/14 16/3 17/2 17/2 17/8 18/9</p> <p><b>theory</b> [2] 17/12 17/19</p> <p><b>there</b> [10] 7/15 9/23 10/18 11/21 12/3 13/7 13/13 13/14 14/6 18/6</p> <p><b>there's</b> [12] 8/19 9/22 10/4 10/4 10/5 10/6 12/9 13/17 14/6 16/18 18/6 20/16</p> <p><b>these</b> [2] 11/12 12/22</p>
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<p><b>T</b></p> <p><b>they</b> [12]  3/23 4/21  5/10 11/25  11/25 12/1  12/25 12/25  13/3 15/4  16/18 20/11</p> <p><b>they're</b> [2]  3/25 16/18</p> <p><b>thing</b> [3]  9/25 17/24  20/11</p> <p><b>things</b> [2]  11/5 11/13</p> <p><b>think</b> [16]  3/18 5/7 6/2  6/20 7/5 7/8  7/24 10/25  14/8 14/9  14/19 14/20  14/20 16/14  19/6 19/13</p> <p><b>this</b> [25]</p> <p><b>those</b> [4]  5/17 10/2  11/4 11/8</p> <p><b>though</b> [2]  6/20 9/13</p> <p><b>through</b> [5]  6/5 7/4  13/23 15/14  16/11</p> <p><b>throw</b> [1]  11/6</p> <p><b>Thursday</b> [1]  1/16</p> <p><b>time</b> [2]  7/23 9/22</p>	<p><b>today</b> [2]  4/7 5/22</p> <p><b>toe</b> [1]  18/13</p> <p><b>together</b> [1]  17/3</p> <p><b>told</b> [1]  11/25</p> <p><b>Tomorrow</b> [1]  16/9</p> <p><b>tomorrow's</b>  [2] 4/6  17/7</p> <p><b>too</b> [1]  19/13</p> <p><b>top</b> [1]  13/11</p> <p><b>transcript</b>  [1] 21/5</p> <p><b>transported</b>  [1] 13/15</p> <p><b>travel</b> [4]  18/4 18/10  18/11 20/3</p> <p><b>trial</b> [2]  7/6 7/6</p> <p><b>triggered</b> [1]  18/25</p> <p><b>trouble</b> [2]  3/24 5/20</p> <p><b>true</b> [1]  21/4</p> <p><b>try</b> [1] 8/24</p> <p><b>trying</b> [1]  11/5</p> <p><b>Tuesday</b> [2]  7/21 7/22</p> <p><b>turn</b> [4] 4/9  5/17 14/5  14/14</p>	<p><b>two</b> [1]  12/10</p> <p><b>type</b> [2]  10/5 12/12</p> <p><b>U</b></p> <p><b>U.S</b> [1] 21/9</p> <p><b>under</b> [4]  11/7 13/3  17/11 17/19</p> <p><b>understand</b>  [2] 20/1  20/7</p> <p><b>understanding</b>  [1] 13/2</p> <p><b>unduly</b> [1]  19/7</p> <p><b>unfairly</b> [1]  19/7</p> <p><b>UNITED</b> [2]  1/1 1/21</p> <p><b>unless</b> [1]  10/5</p> <p><b>until</b> [1]  12/8</p> <p><b>unusual</b> [1]  19/18</p> <p><b>up</b> [4] 6/18  10/22 13/6  13/18</p> <p><b>upheld</b> [1]  19/22</p> <p><b>USB</b> [1] 4/15</p> <p><b>V</b></p> <p><b>vacation</b> [1]  6/5</p> <p><b>verbal</b> [1]  11/25</p> <p><b>verbally</b> [1]</p>	<p><b>very</b> [4]  10/6 11/14  12/20 18/8</p> <p><b>video</b> [2]  17/23 19/4</p> <p><b>view</b> [1]  19/24</p> <p><b>visiting</b> [1]  16/16</p> <p><b>W</b></p> <p><b>want</b> [8]  3/24 5/18  6/14 8/17  9/4 9/5 15/3  17/3</p> <p><b>wanted</b> [2]  3/15 16/9</p> <p><b>wants</b> [1]  11/9</p> <p><b>was</b> [16]  3/10 3/18  3/21 4/9 5/1  5/2 10/9  11/21 13/2  13/7 13/20  13/24 18/5  18/20 18/20  18/24</p> <p><b>way</b> [3] 7/13  8/17 18/6</p> <p><b>ways</b> [1]  18/7</p> <p><b>we</b> [27]</p> <p><b>we'll</b> [4]  16/3 17/6  17/6 17/7</p> <p><b>we're</b> [3]  6/17 8/3 8/4</p>
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<p><b>W</b></p> <p><b>we've [1]</b> 6/24</p> <p><b>week [2]</b> 7/20 8/4</p> <p><b>welcome [1]</b> 6/8</p> <p><b>well [17]</b> 4/5 4/20 5/13 5/16 6/14 6/19 7/18 8/11 8/15 11/14 14/1 17/2 17/19 17/21 18/11 18/19 20/5</p> <p><b>went [2]</b> 13/23 15/14</p> <p><b>were [12]</b> 3/19 3/23 4/10 9/14 10/14 12/11 12/25 13/1 13/2 13/4 14/20 15/4</p> <p><b>weren't [1]</b> 9/24</p> <p><b>what [12]</b> 4/18 5/24 7/8 7/18 7/20 10/17 11/2 11/20 15/19 18/10 19/14 20/8</p> <p><b>what's [2]</b> 7/3 18/25</p> <p><b>whatever [2]</b> 9/5 16/13</p>	<p><b>when [8]</b> 3/19 4/3 5/10 8/13 12/25 14/2 17/14 18/24</p> <p><b>where [1]</b> 15/3</p> <p><b>which [2]</b> 6/22 17/16</p> <p><b>who [3]</b> 4/4 5/19 18/18</p> <p><b>why [9]</b> 5/25 6/2 7/18 8/11 9/11 13/3 16/5 17/3 17/9</p> <p><b>will [8]</b> 6/3 7/15 7/23 9/2 10/24 11/10 18/8 20/15</p> <p><b>Wilmington [1]</b> 1/19</p> <p><b>wish [1]</b> 16/1</p> <p><b>within [4]</b> 5/7 12/4 17/15 17/15</p> <p><b>without [1]</b> 4/21</p> <p><b>witness [1]</b> 3/14</p> <p><b>words [1]</b> 11/2</p> <p><b>work [3]</b> 6/3 7/17 8/5</p> <p><b>workable [1]</b> 20/15</p> <p><b>worked [1]</b> 6/13</p>	<p><b>would [13]</b> 3/22 6/21 7/17 8/13 8/22 9/1 10/15 10/21 11/4 13/8 13/9 13/14 15/6</p> <p><b>wow [2]</b> 8/1 8/6</p> <p><b>wrap [1]</b> 10/21</p> <p><b>written [2]</b> 10/7 10/8</p> <hr/> <p><b>Y</b></p> <p><b>Yeah [1]</b> 12/15</p> <p><b>yes [10]</b> 3/11 3/17 4/12 4/24 5/5 10/19 11/17 14/4 15/24 17/2</p> <p><b>yesterday [4]</b> 4/13 5/10 12/6 12/7</p> <p><b>you [57]</b></p> <p><b>you'd [1]</b> 10/7</p> <p><b>you're [8]</b> 4/23 6/8 6/14 15/9 16/14 16/17 18/9 19/8</p> <p><b>you've [8]</b> 4/8 5/16 12/19 12/19 12/22 13/5 15/21 15/22</p>	<p><b>your [54]</b></p>
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